

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ULKU ROWE,

Plaintiff,

-against-

GOOGLE LLC,

Defendant.

No. 1:19-cv-08655 (LGS)(GWG)

**DECLARATION OF WILL GRANNIS
IN SUPPORT OF DEFENDANT
GOOGLE LLC'S MOTION FOR
SUMMARY JUDGMENT**

I, WILL GRANNIS, declare:

1. I am the Managing Director for the Office of the CTO ("OCTO") in Defendant Google LLC's Cloud organization. I have personal knowledge of the facts set forth in this declaration, or know them to be true in my capacity as an employee for Google based on records that Google keeps in the regular course of business. I could and would competently testify to these facts under oath if called as a witness.

Creation of the Office of the CTO in 2016

2. Google is a global technology company that specializes in internet-related services and products. One of those product offerings is cloud computing. The organization predominantly responsible for building, developing, maintaining, marketing, and selling Google's cloud computing products and services is known as Google Cloud. Google Cloud's main product offering is the Google Cloud Platform, a suite of cloud computing services that runs on the same infrastructure that Google uses internally for its end-user products.

3. Cloud technology is evolving at a rapid pace, and the market for cloud services is intensely competitive.

4. In 2016, Brian Stevens (then the Chief Technology Officer ("CTO") of Google Cloud) and I established the Office of the CTO ("OCTO") within the Google Cloud organization.

OCTO was an innovative new function that did not exist anywhere else within Google.

5. The vision for OCTO was a team of employees with CTO-like qualities (a unique blend of product, sales and marketing focus) to represent Google Cloud externally as the technical face of the organization, and be the liaison between clients and Google's engineering teams. Members of OCTO would advise C-level executives at Google's clients on the technical aspects of how to leverage the power of Google's cloud technology for their business, with the goal of generating interest in Google Cloud and increasing Google's market share in the cloud computing space.

6. The business title for the newly created role was and still is "Technical Director." We identified three key "pillars" of work responsibility for the role. Those "pillars" are customer impact, engineering impact, and evangelism or thought leadership.

7. Technical Directors do not actually build products or manage the teams that build Google's cloud offerings, nor are they responsible for the roadmap or budget for any particular product (although Technical Directors who succeed in the engineering impact pillar can and do make significant contributions to product roadmaps). Those are software engineer and product manager responsibilities found in other areas of Google Cloud.

8. The ideal candidate for the Technical Director role would have been in a CTO role in an industry we were targeting for cloud adoption (*e.g.*, financial services, healthcare, energy, media and entertainment, manufacturing, etc.) or a VP Engineering role at a technology company. Prior experience with cloud migration was relevant to my assessment of a candidate's ability to successfully fulfill the three pillars of responsibility for the job.

Building Out the OCTO Team

9. In late 2016, we decided that the role would span levels 8 and 9. We originally scoped the role as a level 8, but expanded it to include level 9 based on the caliber of candidates

recruited for the role early in the process.

10. Over time we have hired individuals into this role at levels 8 and 9, and some at level 7. All but a few candidates were hired at level 8.

11. I was and continue to be one of the hiring managers for the Technical Director role. I was the hiring manager for a majority of the level 8 Technical Directors listed in my Declaration below. Certain of my direct reports acted as the hiring managers for a small number of individuals listed below, but I was still involved in the discussions around their hire and supported the decisions to hire them at the recommended level. Brian Stevens also interviewed candidates, participated in discussions around their hire, and made leveling recommendations while he was still employed at Google.

12. Information concerning their candidacy, interview feedback, and leveling recommendations are all stored in gHire, Google's proprietary recruiting management tool. As a hiring manager in OCTO, I have access to this information. The following information about these individuals is reflected in gHire, including in some of the statements of support I authored contemporaneously as the hiring manager. Statements of support provide a rationale for the decision to hire the candidate, and provide a recommendation and rationale for the level at which he or she should be hired.

13. All candidates hired into the Technical Director role in OCTO were initially hired as individual contributors, meaning they had no people management responsibilities. Over time, some took on significant people manager responsibilities.

14. All Technical Directors in OCTO hired between 2016 and 2020 report either directly or indirectly to me. For my direct reports, I evaluate their performance during Google's semi-annual performance review cycle and provide substantive feedback for inclusion in their written performance reviews.

Level 8 Male Hires

15. Ron Bodkin (level 8) had a Masters' degree in Computer Science from M.I.T. When we hired him, Ron had 27 years of experience at technology companies. Before joining Google, Ron was the CTO, Services and Architecture, and Vice President and General Manager, Artificial Intelligence at Teradata where he led a cross-functional team to identify and commercialize the company's artificial intelligence offerings.

16. Jesse Burns (level 8) had over 22 years of industry experience at technology companies, including a Vice President role at NCC Group, which specializes in cybersecurity and risk mitigation. His security-related engineering acumen and his demonstrated ability to have direct and detailed engineering engagement with Google Cloud's top prospective clients made him a critical hire for OCTO.

17. Marcus East (level 8) had 23 years of experience including multiple stints as a CTO or Executive Vice President of Product & Technology in a wide array of retail, media, and technology companies. He played a leadership role bringing public cloud (including Google Cloud Platform) to his prior employer, National Geographic.

18. Dean Hildebrand (level 8) earned a doctoral degree in computer science from the University of Michigan. He had approximately 18.5 years of experience prior to joining Google, most recently at IBM in a research role working with the IBM Systems and Cloud division's leadership, development, and sales teams.

19. Mark Kropf (level 8) had 14 years of experience, nearly half of which he spent as the Global CTO for software company Pivotal. He spent the first half of his career as a General Manager, Emerging Technologies at Diebold, a multinational financial and retail technology company. While exploring opportunities with Google, Mark was also offered a Managing Director role at [REDACTED]. He had direct experience working with the adoption of multi-cloud

developer platforms in large enterprise companies.

20. Ben McCormack (level 8) had 17 years of experience at technology and telecommunications companies, including over three years as the Vice President of Global Cloud Operations at Armor Defense Inc. Before joining Google, he worked directly with Google employees to migrate his then-current employer, Evernote, to the Google Cloud Platform.

21. Michael Marano (level 8) had 17 years of industry experience and a strong background in mobile gaming and analytics, which were important vertical and horizontal areas of focus for OCTO, respectively. He had significant firsthand experience deploying production applications to the Google Cloud Platform.

22. Massimo Mascaro (level 8) had earned a Masters' of Science in physics and a doctoral degree in Neuropsychology from Sapienza University of Rome. He had nearly 17 years of experience working for technology companies like Intuit, Intellisis, and Microsoft Corporation, most recently as Intuit's Senior Data Scientist and Chief Data Scientist. He spent many years building and developing cloud products before joining Google.

23. Joel Minton (level 8) earned two Masters' of Business Administration degrees from Columbia and UC Berkeley, and had over 20 years of experience, including Director-level positions at software and e-commerce companies. He had hands-on cloud experience having built TurboTax Online on Amazon's cloud platform while at Intuit.

24. Scott Penberthy (level 8) earned a doctoral degree in artificial intelligence from the University of Washington and a Masters' of Science in computer science from M.I.T. He had over 31 years of experience before joining Google, including as a Managing Director, Technology at PricewaterhouseCoopers, and 18 years of leadership positions at IBM.

25. Eric Schenk (level 8) earned a doctoral degree in computer science from the University of Toronto and a Masters' of Science in computer science from the University of

Calgary. He had over 23 years of experience at technology companies like Amazon.com and, prior to that, Electronic Arts where he was the CTO of EATech. He demonstrated clear cloud tech company engineering leadership.

26. Jeff Sternberg (level 8) had over 23 years of experience before joining Google in a variety of engineering leadership roles. He had worked at technology start-ups where he was the architect of a full data collection and processing platform on Amazon's cloud product, and later helped launch the initial cloud adoption strategy for Ipreo, a financial services technology provider. He possessed years of direct cloud experience dating back to 2012.

27. Bryan Stiekes (level 8) had nearly 18 years of experience before joining Google at cloud technology companies like Hewlett Packard Enterprise and Electronic Data Systems. He had previous experience working in the Office of the CTO at his prior employer.

28. Several Technical Directors in OCTO do specialized work in applied artificial intelligence ("Applied AI") and machine learning, a branch of Applied AI and computer science which focuses on the use of data and algorithms to imitate the learning process and improve accuracy. To perform this work, one generally needs a PhD in computer science, artificial intelligence, or other related coursework like behavioral science or neuropsychology. In addition to fulfilling the other aspects of the OCTO role, individuals with this expertise (including Scott Penberthy and Massimo Mascaro) work with TensorFlow, an end-to-end open source platform for machine learning developed by researchers and engineers within Google's Machine Intelligence Research organization. This work is incredibly valuable to Google Cloud as a whole and OCTO in particular, [REDACTED]. While in OCTO, Penberthy created the canonical reference for all of Google on Applied AI. Mascaro has helped develop a new product category for the Cloud AI platform, and his level of engagement with customers and significant engineering impact has resulted in him earning a Strongly Exceeds

Expectations rating year over year. Ulku Rowe is not among the Technical Directors who work on Applied AI and machine learning.

29. Employees who previously worked in other areas of Google have joined OCTO over time as well. Kawaljit Gandhi joined OCTO in late 2017 from GBO, Google's sales organization. He was an invaluable addition to the team because his extensive understanding of Google Ads (an online advertising solution that businesses use to promote their products and services on Google Search, YouTube, and other sites across the web), infrastructure systems, and Google marketing enhances OCTO's capability to present a cohesive and coordinated suite of products and services to clients. He is the only member of OCTO with this unique expertise and ability to leverage the analytics systems that form the bridge between Cloud products and Ads. He was instrumental in building a joint engagement framework of how Cloud and Ads work together from a technical perspective, and within six months of joining the team was able to secure the business of a large Ads client for Google Cloud. He now leads the team working on Applied AI and machine learning. His success over the years has earned him a Strongly Exceeds Expectations ratings in 2019 and 2020.

Level 9 Hires

30. OCTO hired five individuals at level 9 in 2016 and 2017. All Technical Directors in OCTO are required to demonstrate customer impact and evangelism; those are baseline requirements to meet expectations in the role. What differentiates a level 8 Technical Director from a level 9 is the ability to leverage deep engineering expertise and extensive experience with cloud computing to make a consistent and meaningful impact on Google's product roadmaps developed by our engineering teams.

31. We hired Ben Wilson as a level 9 Technical Director in 2017. Ben demonstrated an impressive knowledge in large-scale cloud operations at his former employer. More so than other

candidates interviewed for the role, Ben understood how to execute cloud migrations and how to instrument cloud platforms from having migrated thousands of applications to the Cloud at GE. He also had significant knowledge and experience working in the oil and gas industries, and Google was interested in targeting this industry for further Cloud adoption.

32. As a Technical Director in OCTO, Ben made significant contributions to the Google Cloud organization and platform. He advised on multiple large-scale mergers and acquisitions for Google, and worked directly with Google Cloud's senior leadership on these initiatives. In connection with these acquisitions, he was the subject matter expert on cloud migrations and infrastructure necessary to understand how the target application was performing. His work directly informed Alphabet board-level decision making in 2017.

33. We hired Evren Eryurek as a level 9 Technical Director in 2016. Evren had years of experience in the healthcare industry, another industry targeted for further cloud adoption. He also had extensive experience developing cloud products and leading massive software engineering organizations at GE Healthcare.

34. As a Technical Director in OCTO, Evren's leadership in the healthcare industry brought enterprise C-suite-level credibility to the organization, and at least five healthcare clients signed deals with Google Cloud in his first year. He carried forward his knowledge and experience in running software engineering teams to make an immediate impact on the roadmap for Google Cloud's streaming products by creating new business opportunities and providing feedback on product development. He transferred to the Product Manager job ladder after he left OCTO in 2018, and the significant engineering contribution he made while in OCTO was one of the reasons he was able to successfully complete that transfer. He now leads all streaming data platform product management for Cloud.

35. We hired Nicholas Harteau as a level 9 Technical Director in 2017. Few people in

the industry had Nic's leadership experience and engineering knowledge of how to scale an enterprise with public cloud. Nic was well-known to Google engineers when he started by virtue of having worked with them to successfully migrate his former employer, Spotify, to the cloud using Google's products and services.

36. While still in OCTO, Nic became deeply involved with Google's engineering teams to improve their monitoring and logging systems, and give our clients greater confidence in Google Cloud's monitoring capabilities. This work resulted in him leaving OCTO in fall 2018 to manage a product team working on Stackdriver, a cloud computing system providing performance and diagnostics data to public cloud users.

37. We hired Paul Strong as a level 9 Technical Director in 2017. Paul had been a CTO, Global Field at VMWare, a cloud computing and virtualization technology company. At VMWare, Paul led the strategy for building virtual machines (a virtualized version of a physical server), a concept which some consider synonymous with cloud today. He is an expert in the physical infrastructure and virtualization layers that support cloud-based applications.

38. As a Technical Director in OCTO, Paul leveraged his deep experience in cloud to secure important partnerships with some of the largest companies in the world, including [REDACTED] where he acts as a technical advisory board member. He works with Google's area tech leads (some of the most accomplished senior engineers within Google Cloud and Core Development) on [REDACTED], an engineering project of massive scope and potentially industry-wide implications.

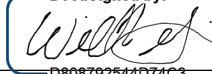
39. We hired Jonathan Donaldson as a level 9 Technical Director in 2017. Jonathan had demonstrated expertise in containers (packages of software that virtualize operating systems and enable them to run anywhere) as the lead executive at Intel Corporation responsible for strategy in this area. He also created the Cloud Native Computing Foundation, the most successful

open source foundation for containers and modern compute architectures.

40. As a Technical Director in OCTO, Jonathan made significant contributions to engineering to advance the roadmap for the Google Kubernetes Engine, the industry's first fully managed service on Kubernetes, the container-centric management software for cloud-based applications. He has also capitalized on his prior leadership experience to become an effective people manager within OCTO, and he now leads a team of other Technical Directors and other employees. He was responsible for creating a hybrid cloud working group to set Google's strategy in this space and reduce time and resources spent on one-off, low-impact projects; standing up the first OCTO engineering pillar group for Cloud Services Platform, Google's software-based hybrid offering; and for authoring a whitepaper Google leadership has termed a "must read" on hybrid cloud.

PURSUANT TO 28 U.S.C. § 1746, I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES OF AMERICA THAT THE FOREGOING IS TRUE AND CORRECT. I AM AWARE THAT IF ANY OF THE FOREGOING STATEMENTS MADE BY ME ARE FALSE, I AM SUBJECT TO PUNISHMENT.

Executed this 29th day of October, 2021, at Austin, TX.

DocuSigned by:

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Will Grannis